

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

GENESCO, INC.,

Plaintiff,

v.

VISA USA INC., VISA, INC., AND
VISA INTERNATIONAL SERVICE
ASSOCIATION,

Defendants.

Civil Action No. 3:13-CV-0202
Senior Judge William J. Haynes, Jr.

JURY DEMAND

ON DENY
MOTION
IS GRANTED
LAW OFFICES
WBT
4-16-15

**PLAINTIFF GENESCO INC.'S MOTION FOR LEAVE TO FILE UNDER SEAL
CERTAIN DOCUMENTS IN SUPPORT OF ITS OPPOSITION TO VISA'S MOTION
TO RECONSIDER A LIMITED PORTION OF THE COURT'S ORDER DENYING
VISA'S MOTION TO COMPEL PLAINTIFF TO COMPLY WITH THE COURT'S
PRIOR ORDERS CONCERNING DISCOVERY OF REMEDIATION MEASURES AND
FOR SANCTIONS**

Today, Plaintiff Genesco Inc. ("Genesco") is filing an Opposition to Defendants' Motion to Reconsider a Limited Portion of the Court's Order Denying Visa's Motion to Compel Plaintiff to Comply with the Court's Prior Orders Concerning Discovery of Remediation Measures and for Sanctions ("Opposition"), together with supporting documents. Genesco respectfully moves this Court for leave to file under seal certain exhibits to the Affidavit of Michael Jo ("Jo Affidavit"), filed in support of Genesco's Opposition.

REQUEST TO SEAL

1. Paragraph 1 of the Agreed Protective Order entered July 3, 2013 (Dkt. No. 48), defines Confidential Discovery Material as "documents or information that constitute trade secrets or reveal confidential research, development, business, financial or commercial